

1 DANIEL G. BOGDEN  
United States Attorney  
2 MARGARET M. STANISH  
Assistant United States Attorney  
3 333 Las Vegas Blvd., South, Suite 5000  
Las Vegas, Nevada 89101  
4 (702) 388-6336

5 **UNITED STATES DISTRICT COURT**  
6 **DISTRICT OF NEVADA**

7 **-oOo-**

9 UNITED STATES OF AMERICA,

10 PLAINTIFF,

11 VS.

12 HEATHER CATHERINE TALLCHIEF,

13 DEFENDANT.

) **CRIMINAL INFORMATION**

) **CR-S-05- 0413 -PMP(6WF)**

) **VIOLATIONS:**

) **Bank Embezzlement – 18 U.S.C. § 656**

) **Credit Union Embezzlement – 18 U.S.C. § 657**

) **Possession of Fraudulently Obtained  
Passport – 18 U.S.C. § 1546**

) **Forfeiture – 18 U.S.C. § 982(a)(2)(A);  
21 U.S.C. § 853(p)**

14 **THE UNITED STATES ATTORNEY'S OFFICE, DISTRICT OF NEVADA CHARGES:**

15 **COUNT ONE**

16 **Bank Embezzlement**

17 **On or about October 1, 1993, in the State and Federal District of Nevada,**

18 **HEATHER CATHERINE TALLCHIEF**

19 the defendant herein, being an armored service security guard and driver connected with Bank of  
20 America, a financial institution insured by the Federal Insurance Deposit Corporation, with intent to  
21 injure and defraud, did embezzle approximately \$2,395,040 in United States Currency of the Bank of  
22 America,

23 all in violation of Title 18, United States Code, Section 656.



**FORFEITURE ALLEGATION ONE**  
Bank Embezzlement Proceeds

1. The allegations of Count One of this Criminal Information are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

2. Upon a conviction of the felony offenses charged in Count One of this Criminal Information,

**HEATHER CATHERINE TALLCHIEF,**

the defendant herein, shall forfeit to the United States of America all property constituting, or derived from, proceeds obtained directly or indirectly, as the result of violations of Title 18, United States Code, Section 656, up to \$2,395,040 in United States Currency.

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 982, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been place beyond the jurisdiction of the court;
- d. has been substantially diminished in value, or;
- e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 18, United States Code, Section 982(b)(1) and Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendant up to \$2,395,040 in United States Currency.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and (b)(1).

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**FORFEITURE ALLEGATION TWO**  
**Credit Union Embezzlement Proceeds**

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3           1.     The allegations of Count Two of this Criminal Information are hereby realleged  
4 and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provisions  
5 of Title 18, United States Code, Section 982(a)(2)(A).

6           2.     Upon a conviction of the felony offenses charged in Count Two of this  
7 Criminal Information,

8                         **HEATHER CATHERINE TALLCHIEF,**  
9 the defendant herein, shall forfeit to the United States of America all property constituting, or derived  
10 from, proceeds obtained directly or indirectly, as the result of violations of Title 18, United States  
11 Code, Section 657, up to \$509,363 in United States Currency.

12           3.     If any property being subject to forfeiture pursuant to Title 18, United States  
13 Code, Section 982, as a result of any act or omission of the defendant --

- 14                         a.     cannot be located upon the exercise of due diligence;  
15                         b.     has been transferred or sold to, or deposited with, a third party;  
16                         c.     has been place beyond the jurisdiction of the court;  
17                         d.     has been substantially diminished in value, or;  
18                         e.     has been commingled with other property that cannot be divided  
19                                 without difficulty;

20 it is the intent of the United States of America, pursuant to Title 18, United States Code, Section

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1 982(b)(1) and Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the  
2 defendant up to \$509,363 in United States Currency.

3 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and (b)(1).  
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5 **DATED:** this 31<sup>st</sup> day of October 2005.  
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7 DANIEL G. BOGDEN  
8 United States Attorney

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10 MARGARET M. STANISH  
11 Assistant United States Attorney  
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